





2017 ANNUAL REPORT

The HAPAC fundraising goal for 2017 was \$125,000. With the support of 204 individuals from 19 hospitals and six SCHA sponsors, the 2017 HAPAC Campaign raised a total of \$71,543. The 14th Annual HAPAC Golf Tournament will be October 17, 2018.

ANMED HEALTH

\$11,725 (235%)

Bill Manson, CEO

HEALTHSOUTH

\$1,000 (100%)

Cathy Landis/CEO

LEXINGTON MEDICAL CENTER

\$4,750 (136%)

Tod Augsburg/CEO

PALMETTO LOWCOUNTY BEHAVIORAL HEALTH, LLC

\$1,000 (100%)

Clint Hauger/CEO

SELF REGIONAL HEALTHCARE

\$5,100 (146%)

Jim Pfeiffer, President/CEO

THE CAROLINA CENTER FOR BEHAVIORAL HEALTH

\$1,000 (100%)

John Willingham/CEO

EDGEFIELD COUNTY HOSPITAL

\$1,000.00 (200%)

Carlos Milanese, CEO

LIFEPOINT HEALTH

\$3,500 (100%)

Scott Campbell/CEO

PALMETTO HEALTH

\$10,700 (107%)

Charles Beaman, CEO

ROPER ST. FRANCIS HEALTHCARE

\$5,300 (106%)

Lorraine Lutton/CEO

SPARTANBURG REGIONAL HEALTHCARE SYSTEM

\$5,000 (100%)

Bruce Holstien, President/CEO

TIDELANDS HEALTH

\$2,500 (100%)

Bruce Bailey/CEO

2017 SPECIAL RECOGNITION

SCHA SOLUTIONS

\$5,000

PHT SERVICES, LTD.

\$4,500

PALMETTO HOSPITAL TRUST

\$1,000

PALMETTO HEALTHCARE LIABILITY INSURANCE PROGRAM

LIST OF INDIVIDUAL CONTRIBUTIONS

HAPAC WOULD LIKE TO THANK OUR 2017 INDIVIDUAL CONTRIBUTORS!

CONTRIBUTION LEVELS

Ben Franklin

\$1,000 and up

Chairman's Circle

\$500 – \$999

Capitol Club

\$350 – \$499

Palmetto Club

\$100 – \$349

Crescent Club

\$20 – \$99

ANMED HEALTH

William Manson • Ben Franklin Club
John Miller, Jr. • Ben Franklin Club
Harold G Morse • Capitol Club
Stoney Abercrombie • Palmetto Club
J. Mark Baker • Palmetto Club
James Boseman • Palmetto Club
Kimberly Burden • Palmetto Club
Anne M. Clinkscales • Palmetto Club
Michael Cunningham • Palmetto Club
Kathy Deloplainie • Palmetto Club
Dale Duncan • Palmetto Club
David Glymph • Palmetto Club
Lynn Gregory • Palmetto Club
Richard Grooms • Palmetto Club
Stephen Hand • Palmetto Club
S. Wayne Harris • Palmetto Club
David Hatch • Palmetto Club
John R Hunt • Palmetto Club
Thomas Kayrouz • Palmetto Club
William Kibler, Jr. • Palmetto Club
John Lomax • Palmetto Club
Joe Martin • Palmetto Club
Rex Maynard • Palmetto Club
Jane Mudd • Palmetto Club
D. Kirk Oglesby • Palmetto Club
Jerry Parrish • Palmetto Club
Christine Pearson • Palmetto Club
Christian Przirembel • Palmetto Club
Robert Rainey • Palmetto Club
Terence Roberts • Palmetto Club
Tim Self • Palmetto Club
Dianne Spoon • Palmetto Club
Marty Stewart • Palmetto Club
Charles Thornton, Jr. • Palmetto Club
Joshua Wentzky • Palmetto Club

Patricia White • Palmetto Club
Wanda Whitener • Palmetto Club
Judy Wilson • Palmetto Club
Donna Beck • Crescent Club
Nedra Brown • Crescent Club
Carolyn Couch • Crescent Club
Elaine Epstein • Crescent Club
Cathy Fousek • Crescent Club
Tammy Gillespie • Crescent Club
Sonya Gould • Crescent Club
Sherry Hewlett • Crescent Club
Greg Kahaly • Crescent Club
Hilda Lindley • Crescent Club
Jody Phillips • Crescent Club
Robert Pierce • Crescent Club
George Reid • Crescent Club
Elaine Reimels • Crescent Club
Juana Slade • Crescent Club
Teresa Threlkeld • Crescent Club
Suzanne Wilson • Crescent Club
Jay Wright • Crescent Club
Sonny Wyatt, Jr. • Crescent Club

ANMED HEALTH CANNON

Willis Grant • Palmetto Club

ANMED HEALTH REHABILITATION HOSPITAL

Denise R. Murray • Palmetto Club

BON SECOURS ST FRANCIS HEALTH SYSTEM, INC

Saria Saccocio • Ben Franklin Club

BON SECOURS ST FRANCIS HOSPITAL

Stephen Porter • Palmetto Club

LEXINGTON MEDICAL CENTER

Jeff Brillhart • Ben Franklin Club
Tod Augsburgur • Chairman's Circle
Terri Dooley • Capitol Club
Lara Moore • Capitol Club
Ann Shuler Shalkham • Capitol Club
Roger Sipe • Capitol Club
Matt Cogdill • Palmetto Club
Michael Greeley • Palmetto Club
Kathleen Herald • Palmetto Club
Harriet Horton • Palmetto Club
Deborah Hunt • Palmetto Club
Kirk Jenkins • Palmetto Club
Melinda Kruzner • Palmetto Club
John Moore • Palmetto Club
Brent Powers • Palmetto Club
Cindy Rohman • Palmetto Club
Mark Shelley • Palmetto Club
Brian Smith • Palmetto Club
Richard Stowe • Palmetto Club
Barbara Willm • Palmetto Club
Jeffrey Wilson • Crescent Club

MARY BLACK HEALTH SYSTEM – SPARTANBURG

Sean Dardeau • Chairman's Circle
Howard Bean • Palmetto Club
Brett English • Palmetto Club
Chanda Flynn • Palmetto Club
Daniel McKinney • Palmetto Club
Stephen Shepherd • Palmetto Club
Stephanie Freeman • Crescent Club
MUSC MEDICAL CENTER
Patrick Cawley • Ben Franklin Club
Daniel Handel • Palmetto Club
Sharon Winkler • Palmetto Club

PALMETTO HEALTH

Charles Beaman • Ben Franklin Club
John Singerling • Ben Franklin Club
Kevin Boggs • Chairman's Circle
Paul Duane • Chairman's Circle
Michelle Edwards • Chairman's Circle
D. Julian Gibbons • Chairman's Circle
Michelle Logan-Owens • Chairman's Circle
Todd Miller • Chairman's Circle
Gregory Gattman • Capitol Club
Mark Mayson • Capitol Club
Judith Baskins • Palmetto Club
James Bridges • Palmetto Club
Louis Brinkerhoff • Palmetto Club
Eric Brown • Palmetto Club
Teresa Carlton • Palmetto Club
Beverly Chrisman • Palmetto Club
Ben Cunningham • Palmetto Club
Gene Dickerson, • Palmetto Club
Timothy Fitzgerald • Palmetto Club
Vince Ford • Palmetto Club
Leslie Hall • Palmetto Club
Jay Hamm • Palmetto Club
Tripp Jennings, Jr. • Palmetto Club
Sarah Kirby • Palmetto Club
Lynn Lambert • Palmetto Club
Mark Loos • Palmetto Club
Satish Prabhu • Palmetto Club
William Renwick • Palmetto Club
Katherine Stephens • Palmetto Club
Carolyn Swinton • Palmetto Club
Deborah Tapley • Palmetto Club
Sam Tenenbaum • Palmetto Club
Howard West • Palmetto Club
Billie Boette • Crescent Club
Sara Fisher • Crescent Club
John Foster • Crescent Club
Emilie Keene • Crescent Club

PALMETTO LOWCOUNTRY BEHAVIORAL HEALTH LLC

Clint Hauger • Ben Franklin Club

ROPER HOSPITAL

Mark Dickson • Chairman's Circle
Tavia Buck • Palmetto Club
Carolyn Donohue • Palmetto Club
Bret Johnson • Palmetto Club
Robert Oliverio • Palmetto Club

Pennie Peralta • Palmetto Club
Matthew Severance • Palmetto Club
Melanie Stith • Palmetto Club

ROPER ST FRANCIS

Lorraine Lutton • Chairman's Circle
Gregory Edwards • Palmetto Club
Mary Flowers-Jefferson • Palmetto Club
Karen Fraser • Palmetto Club
Kathy Guatteri • Palmetto Club
Keith Neuman • Palmetto Club
Stanley Wilson • Palmetto Club

ROPER ST FRANCIS MOUNT PLEASANT HOSPITAL

William A. Jackson • Palmetto Club

SELF REGIONAL HEALTHCARE

William Keith • Ben Franklin Club
James Pfeiffer • Ben Franklin Club
Tim Evans • Chairman's Circle
F. Gregory Mappin • Chairman's Circle
Todd Tamalunas • Chairman's Circle
Craig White • Chairman's Circle
Ken Coffey • Palmetto Club
Mike Dixon • Palmetto Club
Will Gordon • Palmetto Club
Andy Hartung • Palmetto Club
William Isenhower • Palmetto Club
Kendra Keeney • Palmetto Club
Dee McLane • Palmetto Club
Sharon Walb • Palmetto Club

SOUTH CAROLINA HOSPITAL ASSOCIATION

Edward Bender • Ben Franklin Club
Thornton Kirby • Ben Franklin Club
Barney Osborne • Ben Franklin Club
Allan Stalvey • Ben Franklin Club
Neill Cameron • Chairman's Circle
Richard Foster • Chairman's Circle
Sherry Kolb • Chairman's Circle
Rozalynn Goodwin • Capitol Club
Lara Hewitt • Capitol Club
Elizabeth Powers Harmon • Capitol Club
John Schipman Ames • Palmetto Club
Eva Foussat • Palmetto Club
Krista Hinson • Palmetto Club
Buck Kaiser • Palmetto Club
Melanie Matney • Palmetto Club

Marla McKinney • Palmetto Club
Joy Fleming • Crescent Club
Meagan Villalobos • Crescent Club
Ruth Parrish • Crescent Club
Tammy Pope • Crescent Club
David Spink • Crescent Club
Alicia Towne • Crescent Club
Erin Watson • Crescent Club
Carmen Wilson • Crescent Club

SPRINGS MEMORIAL HOSPITAL

Janice Dabney • Chairman's Circle
Richard Warrin • Palmetto Club

TIDELANDS HEALTH

Bruce Bailey • Ben Franklin Club
Gayle Resetar • Chairman's Circle
Judith Ingle • Palmetto Club
Rick Kaylor • Palmetto Club
Carl Lindquist • Palmetto Club
Pamela Maxwell • Palmetto Club
Julian A Reynolds Jr. • Palmetto Club
McRoy Skipper • Palmetto Club
Amy Stevens • Palmetto Club
Beth Ward • Palmetto Club
Daniel Scheffing • Crescent Club
Shireena Williams • Crescent Club



LEGAL DO'S AND DON'TS

Please review the following Federal and State election laws that

FEDERAL FUNDRAISING EFFORTS: AHAPAC

- Each CEO of any hospital that is a member of the AHA must sign and return a Prior Authorization card before HAPAC can solicit eligible hospital employees or Board Members. A form is contained in the packet of campaign materials.
- HAPAC solicitation is limited to salaried, management employees with policymaking or managerial responsibilities at an AHA member hospital or health system. Examples include: Vice Presidents, Human Resources Manager, Social Work Director, etc. Board members may also be solicited.
- All solicitation letters on behalf of HAPAC must be sent on your personal (non-hospital) stationary.
- No hospital funds or resources can be used to underwrite HAPAC fund-raising events, mailings or any other activities.*

STATE FUNDRAISING EFFORTS: HAPAC

- The State HAPAC campaign may receive contributions from individuals, corporations, associations, partnerships and other PACs or businesses.
- There is a \$3500 limit annually on what a donor may contribute to the State HAPAC Campaign.
- There is no limit on contributions to the State HAPAC Operating Account.
- Donors MUST include their name, address, company, email address and occupation with their contribution. Individual donors should also include their home address and home phone number.
- Make sure the solicitation card and pre-printed return envelopes to your address or the CEO's address accompany the solicitation letter.
- All checks should be made payable to HAPAC and sent with completed form to: HAPAC, 1000 Center Point Road, Columbia, SC 29210-5802

* Remember, no hospital funds or resources can be used to underwrite PAC fundraising mailings. HAPAC will be glad to assist any hospital in their fundraising efforts and reimburse for costs incurred. Please contact Carmen Goulet for further information as to how we can help.



PRIOR AUTHORIZATION FORM



American Hospital Association
Political Action Committee
800 10th Street, NW
Two CityCenter, Suite 400
Washington, DC 20001-4956
Tel.(202) 638-1100 Fax(202) 626-2332
<http://www.ahapac.org>

Federal Election Commission Prior Authorization Requirement

The Federal Election Commission (FEC) established federal campaign finance law requiring the American Hospital Association Political Action Committee (AHAPAC), and state hospital associations acting on its behalf, to have prior authorization from the hospital CEO before solicitation of eligible employees of the hospital occurs.

Under Federal law, once the Prior Authorization card is signed, eligible staff can be asked to contribute to the AHAPAC. Hospital employees are eligible if they fall into both of the following categories:

- 1) salaried employees of an AHA and/or state hospital association member hospital, and
- 2) supervisory, managerial/administrative positions with professional responsibilities.

Please be aware that certain state and federal election laws may differ, with state laws being less restrictive in certain areas. If specific questions arise, it may be useful to contact a local attorney.

Complete the following form and mail to the AHAPAC or fax to (202) 626-2332.

AHAPAC Prior Authorization Form

Please print the following information or attach business card.

AHAPAC is authorized as the only federal trade association PAC to solicit contributions from eligible employees of:

Hospital Name

Mailing Address, City, State, Zip

Hospital Executive Name

Title

Email (required)

Please provide signature authorizing for the following year (s) -- approval can be given up to five years in advance:

20 (18) Signature

20 (19) Signature

20 (20) Signature

20 (21) Signature

20 (22) Signature



SOLITICATION GUIDELINES FOR 501(C)(3) HOSPITALS

PERKINS COIE LLP

POLITICAL LAW GROUP

Questions and Answers about Trade Association PAC Activity

Trade associations like the American Hospital Association have to follow particular rules in establishing and soliciting for their PACs. But those rules are not complicated, and there are not many of them. Once mastered, they are relatively simple to follow.

The basic legal framework for AHA or other association PAC activity is as follows. AHA may solicit its members and the members of its affiliated state associations for contributions to the PAC. Affiliated state associations may assist AHA with the solicitation of these members and the collection and transmittal to AHA of contributions made.

This document will summarize the federal rules governing these activities, and discuss some other issues that have arisen in connection with federal PAC political activity.

1. Who Can Be Solicited?

- (a) AHA (or state associations or members soliciting on behalf of AHA) may solicit certain individuals for contributions to their PACs.
 - AHA may solicit its own management;
 - AHA may solicit its members -- whether they are corporate or individual members, but:
 - If it solicits corporate members, it must request permission from the corporation to solicit the corporation's executive and administrative personnel.
 - "Executive and administrative personnel," means those salaried, management employees with policy-making or managerial responsibilities.

- AHA may solicit the members of its affiliated state associations, even if some of those members are not also members of AHA. (The same prior approval rules would apply to any corporate members of a state association.)

EXAMPLE: AHA wishes to solicit the management of a hospital that is a member of a state association, but is not a member of AHA. It may do so if the hospital has given the necessary prior approval to AHA for its PAC to solicit.

EXAMPLE: AHA wishes to solicit the management of a member hospital that has given permission for the solicitation. In conducting the solicitation, AHA (or state associations or members soliciting on behalf of AHA) may solicit hospital Vice-Presidents and others in a managerial capacity, but not secretaries or members of the clerical staff.

EXAMPLE: The solicitation of hospital trustees has raised questions for AHA and its affiliated state associations and members in the past. A recent change in the by-laws of AHA clarified the membership status of individual trustees, who may now be solicited for AHA's PAC.

EXAMPLE: A representative of a state association seeking to solicit on behalf of the AHA PAC at an annual meeting must be careful in addressing an audience consisting of both those who have approved an AHA PAC solicitation and those who have not. The existence of the PAC and its function may be noted along with basic statistical information -- how many contributors, what candidates supported, etc. Any promotion or endorsement of its purposes and its function or any encouragement to participate, however, will be considered a "solicitation" directed to non-solicitable persons under the federal law. This prohibition does not apply where the audience is requested to support AHA's nonfederal program, or the nonfederal program of a state association PAC, where the funds solicited are intended for use in state and local, not federal, elections.

- (b) AHA (or state associations or members soliciting on behalf of AHA) may solicit the management personnel of hospitals exempt from tax under 501(c)(3) of the Internal Revenue Code (provided permission is received as discussed below, and the other mentioned limitations are observed).

Non-profit hospitals may permit AHA solicitation of the executive and management personnel, and these personnel may contribute. The hospital may want to make clear it is not taking a position one way or another on whether eligible

executives should contribute and that it is merely affording opportunities for individual employees to participate, if they choose, in the political process. To this end, the 501(c)(3) hospital should not allow the use corporate resources, such as inside mail or conference rooms, to conduct any solicitation or education efforts, unless there is an existing policy of the hospital to allow private or outside use of the facilities for other non-hospital sponsored activities. Any 501(c)(3) employees assisting with the solicitation must do so in their individual capacity (not on behalf of the hospital) on their own time, using their own resources. Meetings to conduct solicitations or provide information on the PAC should not be part of any hospital sponsored meeting (such as a staff meeting), and mailed solicitations are properly directed to executives and management personnel at their home addresses. The hospitals may provide home mailing lists.

EXAMPLE: A 501(c)(3) hospital CEO considers calling a special meeting to make possible a solicitation on behalf of AHA PAC. She should not, nor should she authorize a regular meeting to be devoted in part to this purpose.

EXAMPLE: Please see the AHA's memorandum on non-profit hospital political activity for a more detailed discussion of these issues.

- (c) AHA PAC may not solicit the PACs established by state associations or hospitals.

PAC to PAC solicitations are prohibited.

- (d) AHA (or state associations soliciting on behalf of AHA) may solicit the management and administrative personnel of affiliated state hospital associations.

Because the AHA and its state associations are considered “affiliated” under the federal campaign finance law, the AHA may solicit the executives of the state associations for contributions to the AHA PAC.

- (e) AHA (or state associations or members soliciting on behalf of AHA) may solicit the management and administrative personnel of a hospital system, as long as the system itself (as opposed to the system’s individual hospitals) is a member of AHA or an affiliated state association in its own right.

As a member of AHA, a hospital system is treated for solicitation purposes like any incorporated member of AHA or its affiliated state associations. Of course, permission to solicit would have to be received before any solicitation could take

place. If the system's hospitals are also members of AHA or an affiliated state association, they may be solicited on the same basis.

2. How Can They Be Solicited?

(a) When soliciting hospitals, AHA must direct the request for permission to solicit to the representative of the hospital with whom the AHA normally deals. This description may fit a number of individuals: it may be any individual within the management structure of the hospital who has the authority to work with AHA on these PAC matters. It does not have to be the President of the hospital, but someone with the delegated authority to bind the hospital with a decision on the permission to solicit.

Note: While the law is not altogether clear on this point, a system CEO should not grant permission for a member hospital that is solicitable by AHA. Rather, a responsible management representative of that hospital must grant permission.

(b) The request for permission by AHA must request in clear terms the opportunity to solicit the executives of a solicitable entity for contributions for particular years -- that is, the current or immediately following year, or future years.

If AHA does request permission to solicit for several years, that request must be clearly identify each of the years for which solicitation permission is sought and provide that the approving corporate representative approve with a separate signature for each such year.

The request must also state that the corporation may not approve solicitations by more than one trade association in the same calendar year.

EXAMPLE: An AHA member has given permission for AHA to solicit its members for AHA PAC for a particular year. The Federation of America Health Systems (or another trade association) may not also receive permission to solicit the management of that hospital for that same year.

EXAMPLE: A CEO has granted permission for AHA PAC solicitations for a 5-year period. If the CEO leaves during that period, the permission still stands, and AHA (or its state associations or members soliciting on its behalf) may continue to solicit the hospital management for AHA PAC.

3. When Can They Be Solicited?

(a) The solicitation may begin immediately following approval in writing by the representative of the hospital whose permission was sought. There is no specific requirement that AHA must have received a copy of the approval before the solicitation begins (though AHA must maintain the properly executed written approval in its records). But -- and this is the basic requirement -- the approval must have been issued by the hospital representative before any oral or written solicitations of company executives have been conducted on behalf of AHA.

Please note: the term "solicitation" is broadly construed under federal law and includes any favorable mention of a political committee and the opportunities it affords for political participation. So a solicitation may be indirect -- and still be a "solicitation" which should not take place until the permission to solicit has been obtained from the corporate member. As noted above, a basic report on PAC activities is acceptable, but any promotion of the PAC and the opportunities it affords for effective political participation would constitute a solicitation. While AHA PAC may accept unsolicited contributions, merely telling someone of that right is, itself, a solicitation.

(b) Once permission is granted, and if the hospital granting permission does not seek to limit the number of solicitations, AHA (or state associations or members soliciting on behalf of AHA) may solicit management as many times as it wishes in the year.

(c) AHA (or state associations or members soliciting on behalf of AHA) must state clearly in any solicitation the political purpose for which the contributions are solicited, and must state also that all contributions are voluntary and will in no way affect the status, terms or conditions of the executive's employment. If guidelines for contributions are suggested, such as the amount generally expected from executives at certain salary levels, the solicitation must state that the guidelines are only suggestions, and that executives may contribute more, less or not at all, without fear of reprisal or other disadvantage. The solicitation must also inform the contributor that contributions are not deductible for federal income tax purposes.

4. How State Associations and Hospitals Help with Fundraising?

(a) Hospitals approving a solicitation may distribute AHA solicitations to its management and encourage their participation in meetings or by written communications. **But note:** all encouragement to contribute must be accompanied by the assurances required also of AHA -- that the decision to contribute is voluntary, and that the decision to contribute or not to contribute will have no effect on employment

position. [Note: 501(c)(3) hospitals should consult the memorandum on nonprofit hospital political activity.]

(b) The state associations and/or their PACs also may and do play a role in the process as “collecting agents” -- a term used in the federal law to describe affiliates of a trade association that act as agents in “collecting” contributions and forwarding them to the national association. When the associations solicit contributions for their own PAC activity, or bill members for dues, they may also solicit from those hospitals that have approved AHA solicitations and transmit the contributions they receive to the AHA.

(c) In assisting AHA with fundraising, the state associations and/or their PACs must meet certain legal requirements. These are:

- to transmit the contributions to the AHA in a timely manner;

Federal law requires that a contribution received should be forwarded to AHA within 30 days if the amount is \$50 or less, and within 10 days if the amount is more than \$50.
- to report to the AHA in detail the identity of the contributors whose contributions are included in any amount transferred to AHA;
- to maintain records of contribution deposits and transmittals for three years;
- to follow certain procedures for the collection of the contributions prior to transmittal to AHA. Prior to transmittal to AHA, state associations may deposit the money collected for AHA’s PAC in a special transmittal account, in the state association’s account, or in a nonfederal political account. In each case, the state association must maintain separate records of the contributions collected for and transmitted to AHA’s PAC.

The moneys collected may be transmitted to AHA by contributors checks or in a lump sum (in a single check) but the check must be accompanied by a letter or statement detailing the contributors whose moneys make up the amount of the transfer. The detail should include the name and address of each contributor where contribution exceeds \$50 and the date of receipt of the contribution. For any contribution exceeding \$200, the detail should include the occupation of the contributor and name of his or her employer.

(d) Because they are considered affiliated with AHA, a state association may use payroll deduction for contributions by its own executive and administrative personnel to AHA PAC. A hospital or hospital system soliciting on behalf of AHA, however, may **not** use payroll deduction for contributions to AHA's PAC.

5. How is State Association PAC Activity Related to AHA PAC?

AHA's operation of its PAC does not affect the ability of a state association to operate its own PAC. **But** the state association and AHA federal PACs are affiliated - which means that contributions made to one, count also as contributions to the other; and contributions made by one count also as contributions made by the other.

For this reason, a state association with its own federal PAC must keep the AHA informed about the contributions it makes separately to federal candidates, so that the contribution limits shared by the AHA and state association PACs are not exceeded for any candidate by their respective activities.

State law governs a state association's nonfederal PAC.

6. Can a State Association (or Hospital) Use its Internet Website on Behalf of AHA's PAC?

The Federal Election Commission has taken the position that information on an Internet website is the equivalent of "public political advertising." As a result, any information about AHA PAC or federal candidates that is placed on a website is considered communications beyond those whom AHA may solicit. Because of the restrictions on soliciting for AHA PAC, a state association or hospital must be careful in using its site on behalf of AHA PAC. Nonetheless, some information can be made available.

EXAMPLE: A member hospital wants to provide information about AHA PAC on its website. It may place basic information about the PAC (names of candidates supported, how many contributors, how many Capital Club members, etc.) on that portion of its site open to anyone. As with other general communications, such as at an annual meeting, the information on the general website should not encourage people to contribute to the PAC or otherwise exhort them to participate.

